Earth Systems
Environmental Engineering

October 18, 2022

Via Email/Sharefile

Ms. Julia Galayda, Case Manager
New Jersey Department of Environmental Protection
Mail Code 401-05F
PO Box 420
Trenton, NJ 08625

Re: Response to Comments – Comment Letter Pre & Post Closure Groundwater Sampling Plan RTC (July 6, 2022)
Hess Corporation Former Port Reading Complex (HC-PR)
750 Cliff Road
Woodbridge, Middlesex County, New Jersey
NJDEP PI# 006148
ISRA Case No. E20130449
EPA ID No. NJD045445483

Dear Ms. Galayda:

Earth Systems, Inc. (Earth Systems) has prepared this letter on behalf of Hess Corporation (Hess) in response to the July 6, 2022 comment letter regarding the Pre & Post Closure Groundwater Sampling Plan Response to Comments (RTC) submitted by Hess and Earth Systems on April 22, 2022.

NJDEP Comments & Earth Systems/Hess Responses

NJDEP Comment 1: The response is acceptable. Please include correspondence in an appendix to the finalized No. 1 Landfarm groundwater sampling plan (GWSP) for future reference.

Earth Systems/Hess Response 1: No response required.

NJDEP Comment 2: The response is acceptable. Information was provided on an interim status operating period for the No. 1 Landfarm prior to RCRA Part B permitting.

The No. 1 Landfarm will follow closure and post closure requirements consistent with 40 CFR Part 264 incorporated by reference to the New Jersey Hazardous Waste Regulations (N.J.A.C. 7:26G-1 et seq.).

Earth Systems/Hess Response 2: No response required.

NJDEP Comment 3: While a stand-alone Conceptual Site Model (CSM) is not required for the No. 1 Landfarm, local influences on ground water flow and potential contaminant migration need to be considered in the No. 1 Landfarm sampling plan. Some specific considerations, such as a tidal influence evaluation at No. 1 Landfarm wells, is needed to finalize the plan. Tidal influence may affect well locations and/or time of sampling to reflect potential impacts to ground water and contaminant migration. Clarify that a tidal influence evaluation will be performed after installation of the additional monitor wells (Comment 4, below).

If there are impacts to ground water, an assessment of ground water–surface water interaction and investigation of potential discharge to surface water impacts will be needed. The Department concurs that this can be part of the AOC 104 North Ditch remedial investigation.

Existing well records/logs were provided as part of the response. Aware Corporation 1985 design drawings (provided with the November 1, 2019 response to comments on the 100% cap design for the No. 1 Landfarm) were not included with the response for future reference.

The AWARE 1985 design drawings will need to be included with the final No. 1 Landfarm GWSP. They should also be included with the RAR – Construction Complete Report for the No. 1 Landfarm capping.

Earth Systems/Hess Response 3: A tidal influence evaluation will be performed after the installation of the additional monitoring wells. Based on analytical data and the tidal evaluation, an assessment will be made if any additional groundwater monitoring points are required.

The AWARE 1985 drawings have been included with this response.

NJDEP Comment 4: This comment referred to the assessment of potential ground water impacts from: 1) wastewater management systems installed for leachate and stormwater collection, treatment, discharge, and 2) the No. 1 Landfarm treatment areas along downgradient ground water flow paths between L1-2 and L1-3. The leachate collection sump (5 sections of 8' reinforced concrete pipe jointed together) was identified as a specific concern.

<u>40' Leachate Collection Sump</u>: The 40-foot-long leachate collection sump and leachate piping exiting the landfarm and connecting to the sump, is an area of specific concern with respect to the No. 1 Landfarm monitoring plan. This was discussed during the April

27, 2022, site visit. Flow paths from the sump do not appear to be reflected by L1-2 or L1-3. Based on field discussions, the 40-foot-long sump will be included on the No. 1 Landfarm figures and an additional well location was discussed within the fenced area limits of the No. 1 Landfarm and downgradient of the 40-foot sump; the well location will be included in the sampling plan.

Well Sampling Data: Current well sampling was summarized. Future well sampling location, frequency and parameters are evaluated with Addendum B, below.

Proposed Wells: Two additional wells are described and shown on Figure 1 (attached). One well appears to be downgradient of former leachate/storm water piping, oil/water separator and oil sump. A second well is closer to the No. 1 Landfarm limits along downgradient flow paths from a large portion of the land treatment area and between L1-2 and L1-3. The Department concurs with the proposed well locations.

Earth Systems/Hess Response 4: No response required.

NJDEP Comment 5: A and C: Ground water and sump sampling comments are provided under Addendum B, below.

Item B: The response is acceptable. The response clarified that the storm water gate valve is closed when leachate is discharged to the manhole and then to the treatment building so there is no mixture with storm water at the treatment building sampling point.

Item D: The response stated leachate volumes are reported under the New Jersey Pollutant Discharge Elimination System (NJPDES) Discharge to Surface Water permit. Clarify that leachate volume reporting under the DSW permit will be provided to BCM as part of the closure/post closure GWSP.

Earth Systems/Hess Response 5, Item D: As requested, leachate volume information will be provided to the Bureau of Case Management (BCM) as part of post closure monitoring/reporting.

NJDEP Comment 6: Sampling plan clarifications were provided. Cap construction began October 2021.

Item A: BG-wells are included in the sampling plan for SVOCs, metals and ammonia analyses. Volatile Organic Compounds (VOCs_ are excluded based on prior data sets. 2021 Field Sampling Data Sheets were reviewed with the No. 1 Landfarm data sets. A Department summary of some of the Field Sampling Data Sheet (FSDS) data is attached. The data is accepted with limited qualifications. Since BG-2 and BG-3 are screened below the water table and have drawdown greater than 0.33', the following needs to be considered in their sampling:

- Sampling should target pump intakes 2-3' below the top of screen due to drawdown and to ensure that the stabilization readings minimize any mixing with casing water at the pump intake at these low yielding wells.
- Depth to Water (DTW) after pump placement and prior to pump start is requested as the first FSDS data reading.

- Due to established drawdown during purging, purge rates need to be reduced as soon as possible.
    - During future sampling events, pump placement will be targeted in the depth specified above and the additional Depth to Water reading will be recorded on the groundwater field low flow sheet. Pumping rates will be reduced to the lowest rate possible to minimize drawdown.

Item B: The response is acceptable.

- No response required.

Item C: L1-2 and L1-3 will be sampled annually for VOC parameters. Sampling will be performed at peak low tide if the wells are tidally influenced. This will require a tidal fluctuation evaluation.

- See above Response 3 regarding conducting a tidal evaluation.

Item D: See Comment 4, above, regarding ground water monitoring for the 1) No. 1 Landfarm, 2) leachate and storm water management infrastructure, and 3) No. 1 Landfarm leachate collection sump.

- No response required.

Item E: The response is acceptable. A well construction summary table for No. 1 Landfarm wells was attached based on the November 2021 approved Well Construction Manual. This table will need to be updated with the new well completion information.

- The Well Construction manual will be updated annually to include any new well construction information.

Item F: The tidal stage at sampling will be recorded during gauging and sampling at the No. 1 Landfarm on the FSDS. Clarify that this will include gauging at the North Ditch L1-SW.

- Gauging of the surface gauge in the northern ditch will be recorded during future groundwater sampling events.

Earth Systems/Hess Response 6: See above bullets for individual responses.

NJDEP Comment 7: The response stated the manhole, oil/water separator, oil sump, leachate sump, etc. require further investigation. These units are outside of the limits of the No. 1 Landfarm treatment area. See Addendum A, below.

Earth Systems/Hess Response 7: See Response 10 below.

NJDEP Comment 8: The response is acceptable (see Comment 3, above). Investigation of any impacts to the North Ditch due to No. 1 Landfarm operations, including impacted ground water discharge to the North Ditch, will be evaluated under AOC 104.

Earth Systems/Hess Response 8: No response required.

NJDEP Comment 9: In the figure above, identify storm water treatment/management/discharge changes since cessation of discharge to the AWWT Plant and information that leachate is directed to the treatment plant without mixing with storm water. The April 27, 2022 site visit identified storm water storage in frac tanks.

Earth Systems/Hess Response 9: Since the cessation of discharge to the AWWT Plant, the onsite leachate treatment system (Permit No. NJG0225720) has handled all leachate and stormwater within the confines of the No.1 Landfarm. The main function of the leachate collection system is to treat all stormwater that has leached through the treatment zone. The leachate is collected in the leachate collection piping and gravity flows to the leachate sump. At no point during the leachate collection system operation is stormwater mixed with the leachate.

During the April 27, 2022 site visit:

- The stormwater that was identified in the frac tanks was associated with the temporary dewatering treatment system (Permit No. NJG0310905) that was mobilized to site to fulfill the dewatering needs during the No.1 Landfarm cap construction.

During the October 2021 cap construction, the leachate collection system remained online to treat all No.1 Landfarm leachate. The temporary dewatering system was mobilized to the site to efficiently treat all stormwater during construction activities.

Please note that personnel from the NJ Pollutant Discharge Elimination System (NJPDES) conducted a Site inspection on June 16, 2022 of the No. 1 Landfarm leachate system and the inspection noted that no violations were found. A copy of the inspection results has been included with this letter.

NJDEP Comment 10: Based on the figure above, clarify and list the structures that were associated with No. 1 Landfarm operations. This would appear to include the 40-foot leachate sump and manhole; AOC 35 units (e.g., piping outside of the landfarm, oil sump, oil/water separator, etc.); and the current treatment works (piping/building).

Earth Systems/Hess Response 10: The infrastructure that is associated with the No.1 Landfarm leachate collection system operations include the leachate sump, the manhole and the treatment works piping and treatment shed/trailer.

The AOC 35 units (piping outside of the landfarm, oil sump, oil/water separator etc) are out of service and do not function as a part of the leachate collection system operations. This infrastructure will be addressed separately (see Response 11).

NJDEP Comment 11: All units associated with the RCRA land disposal unit need to be included in the RCRA closure process. Investigation and closure plans will be needed for these structures. A schedule is requested.

Earth Systems/Hess Response 11: A closure plan will be prepared and submitted for review to address all historic infrastructure associated with the landfarm operations. Hess/Earth Systems will update the NJDEP with a target delivery date.

NJDEP Comment 12: Leachate Sample Collection Methods:"…The NJDEP is concerned that the current sample collection method could potentially bias the results for VOCs low. Please note that (as summarized below) VOC results have been consistently below Groundwater Quality Standards (GWQS)...". Historic sample collection via the leachate discharge stream to the manhole, or at the Treatment Building after discharge to the manhole and conveyance to the Treatment Building sample port, are not conservative for VOCs. VOC sampling methods that are not conservative for VOCs result in qualified VOC data. The design diagrams and affirmation that the leachate collection sump can be sampled prior to pumping out to the manhole and then to the Treatment Building will mitigate this concern.

Earth Systems/Hess Response 12: No response required. Please note that as summarized in the initial response, nearby monitoring wells are sampled on a quarterly basis and groundwater concentrations for VOCs have been consistently below applicable standards.

NJDEP Comment 13: "…Also, the landfarm is surrounded by six (6) groundwater monitoring wells that are sampled on a quarterly basis. Groundwater samples collected from all of these monitoring wells have also been consistently below GWQS for VOCs as well...". As previously identified, most No. 1 Landfarm wells are upgradient to side gradient of the No. 1 Landfarm land application/treatment areas. L1-2 and L1-3 appear to represent flow paths from portions of land treatment areas. Item 4, above, identifies new well locations that represent flow paths from: 1) the majority of the land treatment area; 2) leachate/storm water management structures; and 3) the 40-foot leachate collection sump.

Earth Systems/Hess Response 13: No response required.

NJDEP Comment 14: "…the collection of the leachate sample can be modified going forward and be collected via a bailer from the existing leachate sump. The leachate within the existing sump can be accessed via vertical piping that currently houses the liquid level sensor, which can be temporarily removed during sampling events and immediately replaced to continue normal operations…". This response addresses the immediate question of another way to sample the sump. Additional information is requested on sump access/sampling:

- Clarify: 1) which access point will be used for sampling based on below drawing and actual site conditions, and 2) whether both the float/vent pipe and withdrawal pipes are screened pipe sections (the withdrawal pipe appears to be slotted within the sump but the saved drawing section for the vent pipe with the float ball isn't clear).
    - All pipe sections are steel casing, and no screened piping is present. The steel casing that houses the liquid level sensor will be the access point to the leachate sump for future leachate sampling.
- Assess sediment accumulation in the sump.
    - A visual inspection of the sump will be conducted prior to sampling to determine if there is sediment accumulation.
- As part of sampling plan:

    - Screen for PID when open sump access point.
    - Screen for LNAPL at leachate liquid surface with interface probe at initial sampling event.
    - Determine DTW and Total Depth to determine leachate sump water column length at time of sampling and targeted bailer sample interval (e.g., mid-point water column).
        - The above specified tasks will be completed prior to future leachate sampling events and the results recorded on the field data worksheet.
- Clarify if all leachate sample parameters (VOC+TICs, SVOC+TICs, TAL metals, ammonia) will be collected from the leachate sump and the sample collection method(s) for the analytes (e.g., bottom filling bailer, peristaltic pump, etc.).
    - The leachate sample will be collected via a bottom filling bailer for all specified parameters.

Earth Systems/Hess Response 14: See above individual responses.

NJDEP Comment 15: Analytical Results: The leachate summary table shows recent reductions in nickel concentrations. Please discuss the change in nickel concentrations between 2020 and 2021. Were any changes made to the pump or the pump intake depth within the sump? If there is any sediment accumulation within the sump, and the pump intake was reset higher in the sump, this could result in a change in leachate sample results. Leachate data summaries need to identify any changes in leachate sample locations, e.g., at discharge to manhole, at the Treatment Building sample port, at the sump, etc.

Earth Systems/Hess Response 15: No changes to the leachate sump pump intake have been made, therefore sample collection location and methodology remains consistent with previous sampling events. The current construction of the leachate pump intake pipe is steel welded, so no changes to depth intake are possible. The nickel concentrations appear to be a function of changing site conditions.

NJDEP Comment 16: The Sampling Summary Table does not include annual VOC sampling at L1-2 and L1-3 (Comment 6, Item C).

Earth Systems/Hess Response 16: The sampling summary table has been revised to include annual sampling of L1-2 and L1-3 for VOCs (see below).

Sample ID	Frequency**	Parameters	Location
Leachate (Pre-Treatment)	Quarterly *	TCL VOCs + Tics, TCL SVOCs + TICs, TAL Metals, Ammonia, and Volume	Not Applicable
SP-1, SP-2, and SP-3	Quarterly	TCL VOCs + Tics, TCL SVOCs + TICs, TAL Metals, Ammonia	Up-gradient/Side-gradient
L1-1 through L1-4	Quarterly	TCL SVOCs + TICs, TAL Metals, Ammonia	L1-2 and L1-3: down-gradient, L1-1: up-gradient, and L1-2: side-gradient
L1-2 and L1-3	Annually	TCL VOCs + Tics	Down-gradient
BG-2 and BG-3	Quarterly	TCL SVOCs + TICs, TAL Metals, Ammonia	Side-gradient
Proposed Wells – L1-5 and L1-6	Quarterly	TCL VOCs + Tics, TCL SVOCs + TICs, TAL Metals, Ammonia	Down-gradient

*Leachate samples will be collected until only a de minimus amount of leachate is being produced. Leachate volumes are expected to decrease following capping of the landfarm.

**A modification of sample parameters may be requested once four (4) quarters of post remediation analytical results are below applicable GWQS.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at ablake@earthsys.net. If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

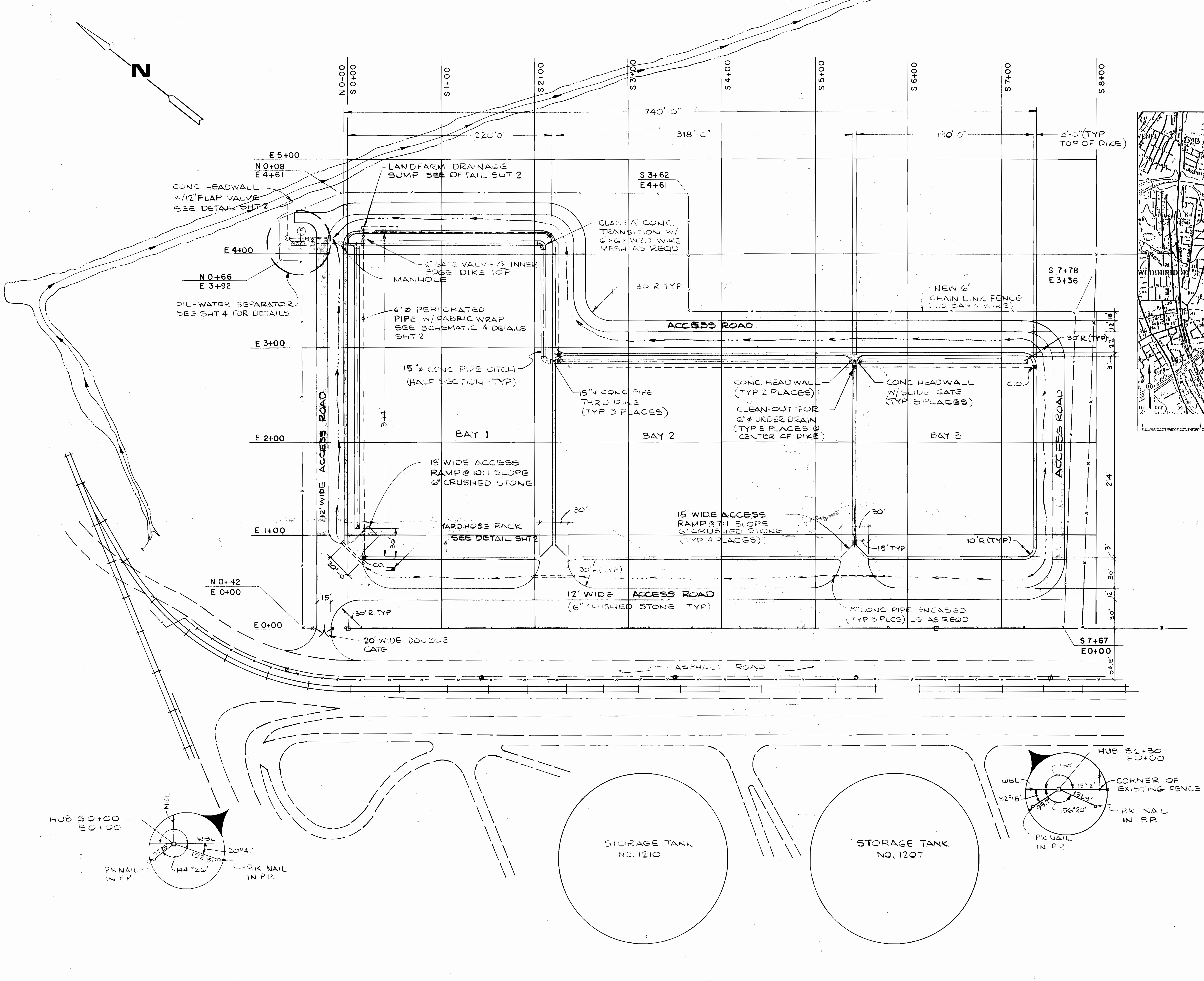
Amy Blake
Sr. Project Manager

c. Mr. Sameh Abdellatif – USEPA (via email/Sharefile)
Mr. John Schenkewitz – Hess Corporation (via e-mail)
Mr. Shawn Ryan – Earth Systems (via e-mail)
Mr. John Virgie – Earth Systems (via e-mail)

April 1985 AWARE Inc. Drawings

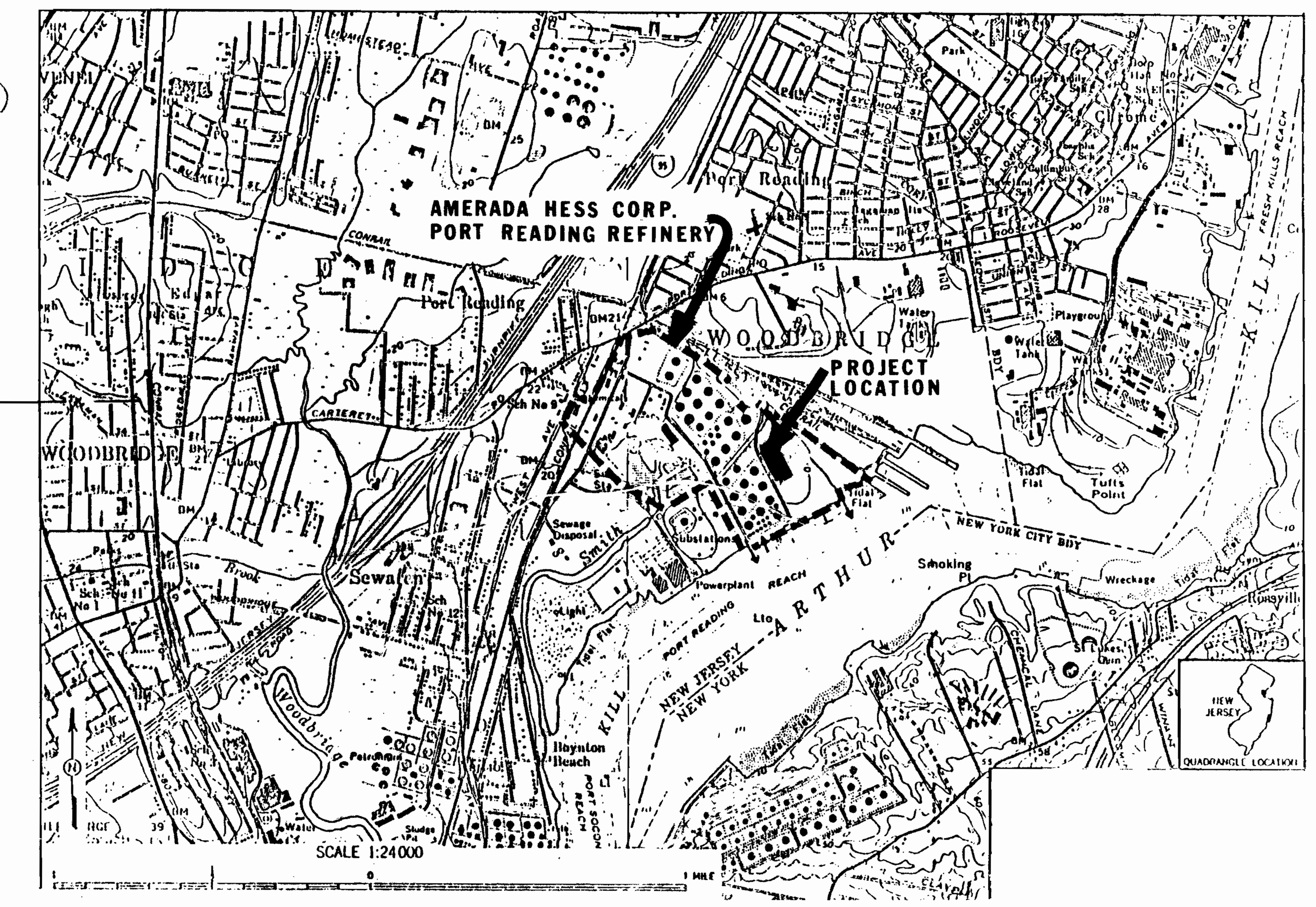
(Comment 3)

BENCH MARK NO. 515
LOCATED NORTH SIDE OF ROAD NEAR REFINERY DOCK APPROX. 1,000 FEET SOUTH-EAST OF PROJECT AREA. TOP OF CONC. MONUMENT ELEVATION 11.62 FT.



N
N 0+00
S 0+00
S 1+00
S 2+00
S 3+00
S 4+00
S 5+00
S 6+00
S 7+00
S 8+00
740'-0"
220'0"
318'-0"
190'-0"
3'-0"(TYP TOP OF DIKE)
E 5+00
N 0+08
E 4+61
LANDFARM DRAINAGE SUMP SEE DETAIL SHT 2
CONC HEADWALL W/12" FLAP VALVE SEE DETAIL SHT 2
S 3+62
E 4+61
CLASS "A" CONC. TRANSITION W/ 6"×6"× W2.9 WIRE MESH AS REQD
E 4+00
6" GATE VALVE @ INNER EDGE DIKE TOP
MANHOLE
N 0+66
E 3+92
OIL-WATER SEPARATOR SEE SHT 4 FOR DETAILS
30'R TYP
S 7+78
E 3+36
NEW 6' CHAIN LINK FENCE (W/3 BARB WIRE)
6" Ø PERFORATED PIPE W/ FABRIC WRAP SEE SCHEMATIC & DETAILS SHT 2
ACCESS ROAD
E 3+00
30'R (TYP)
15" Ø CONC PIPE DITCH (HALF SECTION - TYP)
15" Ø CONC PIPE THRU DIKE (TYP 3 PLACES)
CONC. HEADWALL (TYP 2 PLACES)
CLEAN-OUT FOR 6" Ø UNDER DRAIN (TYP 5 PLACES @ CENTER OF DIKE)
CONC HEADWALL W/ SLIDE GATE (TYP 3 PLACES)
C.O.
344'
BAY 1
BAY 2
BAY 3
E 2+00
12' WIDE ACCESS ROAD
ACCESS ROAD
18' WIDE ACCESS RAMP @ 10:1 SLOPE 6" CRUSHED STONE
214'
30'
15' WIDE ACCESS RAMP @ 7:1 SLOPE 6" CRUSHED STONE (TYP 4 PLACES)
YARDHOSE RACK SEE DETAIL SHT 2
E 1+00
15' TYP
10'R (TYP)
3'
30'R (TYP)
N 0+42
E 0+00
12' WIDE ACCESS ROAD (6" CRUSHED STONE TYP)
15'
30'R. TYP
8" CONC PIPE ENCASED (TYP 3 PLCS) LG AS REQD
E 0+00
20' WIDE DOUBLE GATE
S 7+67
E0+00
12'
22'
30'
54.5'
ASPHALT ROAD
HUB S6+30 E0+00
CORNER OF EXISTING FENCE
WBL
157.2'
131.9'
32°15'
99.7
156°20'
P.K. NAIL IN P.P.
PK NAIL IN P.P.
HUB S0+00 E0+00
N
WBL
77.25'
152.51'
20°41'
144°26'
PK NAIL IN P.P
P.K NAIL IN P.P.
STORAGE TANK NO. 1210
STORAGE TANK NO. 1207

SITE PLAN
SCALE 1"=50'-0"



LOCATION MAP

LEGEND

- (12) EXISTING CONTOURS
- [12] PROPOSED CONTOURS
- EXISTING ROADWAY
- FENCE LINE
- RAILROAD
- Ø POWER POLE (P.P.)
- CLEAN-OUT (C.O.)
- VALVE & BOX
- SURVEY HUB
- DRAINAGE DITCH

INDEX OF DRAWINGS

1. SITE PLAN
2. GRADING PLAN & DETAILS
3. LANDFARM SECTIONS & DETAILS
4. MISCELLANEOUS DETAILS

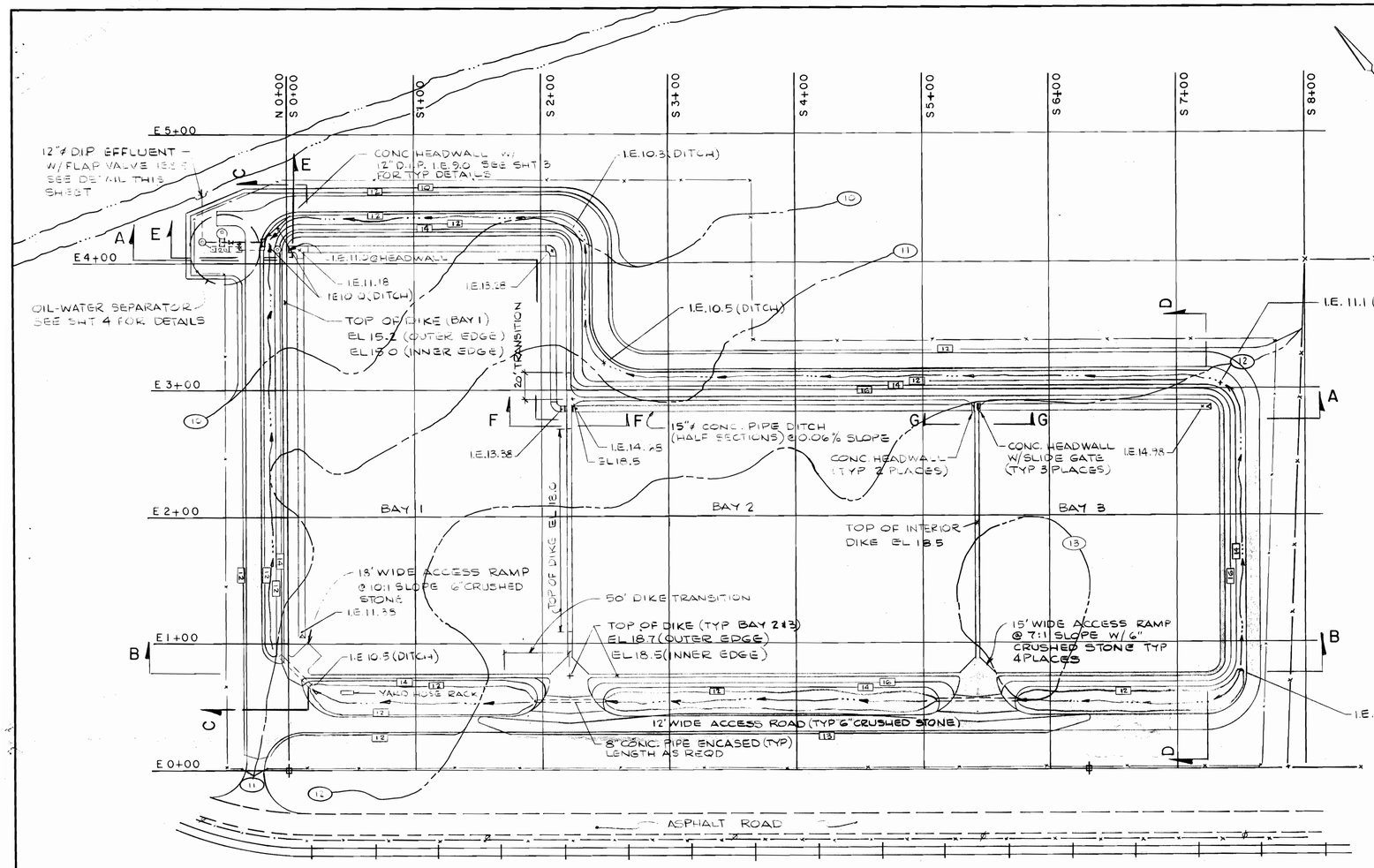
THE AWARE CORPORATION
NASHVILLE, TENNESSEE
HOUSTON, TEXAS

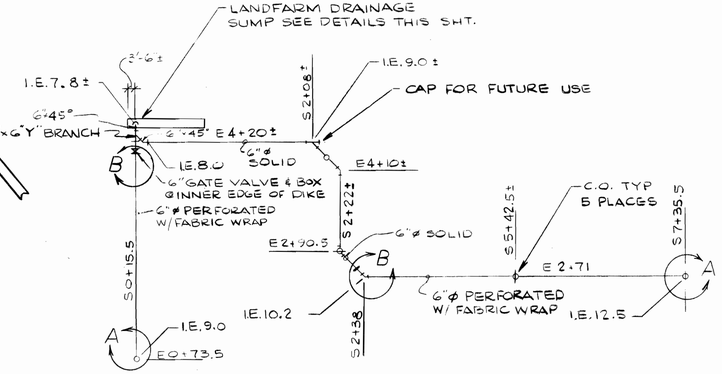
AMERADA HESS CORPORATION
PORT READING REFINERY

NO. 1 LANDFARM

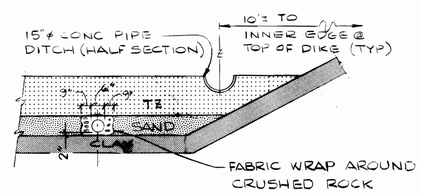
SITE PLAN

DESIGNED: E.T.W.	CHECKED: [signature]	CLIENT APPR:
DATE: JAN 1985	DATE:	DATE:
DRAWN: L.I.H.	APPROVED:	ISS FOR CONST.
DATE: JAN 1985	DATE:	DATE:
SCALE NOTED / DATE PRINTED JAN 1985	JOB NUMBER 6217	DWG NO 1 OF 4



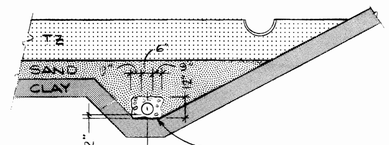


LINE DIAGRAM – UNDERDRAIN
SCALE NONE

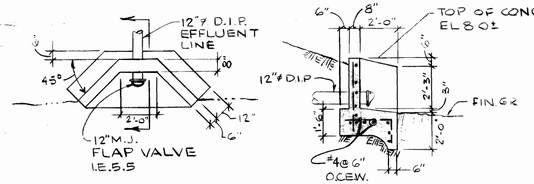


DETAIL A
SCALE NONE

NOTE: OWNER TO FURNISH 15"ϕ (SPLIT) CONC. PIPE. CONTRACTOR SHALL INSTALL CONC. PIPE DITCH & CLASS A CONC. TRANSITIONS AS REQD

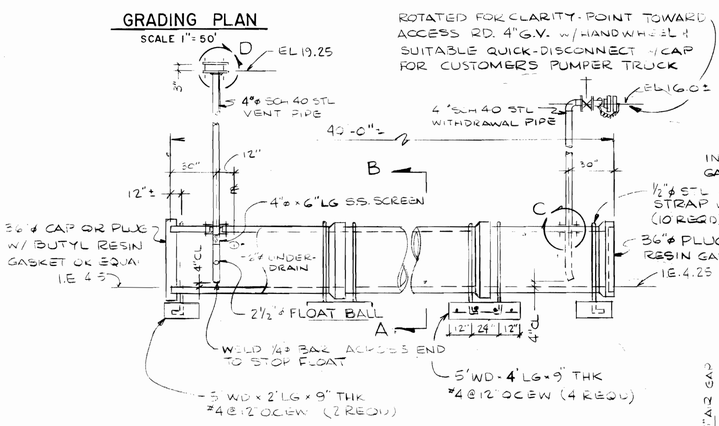


DETAIL B
SCALE NONE



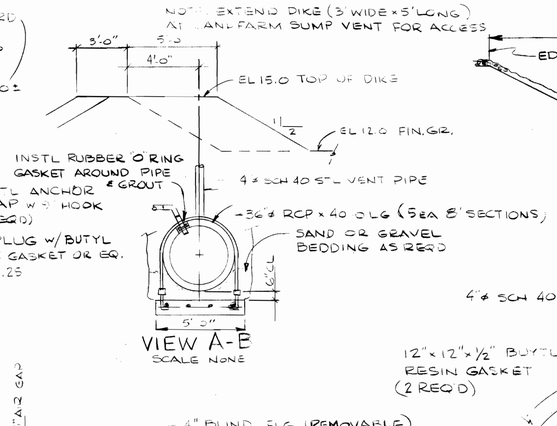
HEADWALL DETAIL
SCALE NONE

GRADING PLAN
SCALE 1" = 50'

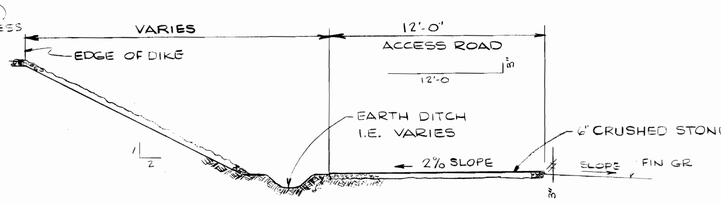


NOTE: PAINT EXPOSED METAL W/ 2 COATS EXTERIOR ENAMEL

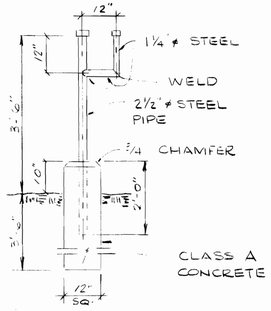
LANDFARM DRAINAGE SUMP
SCALE NONE



VIEW A-B
SCALE NONE

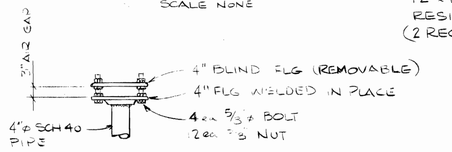


TYPICAL ACCESS ROAD
SCALE 1/4" = 1'-0"



YARD HOSE RACK DETAIL
SCALE NONE

NOTE: PAINT HOSE RACK W/ TWO COATS EXTERIOR ENAMEL



DETAIL D
SCALE NONE

DETAIL C
2 PLACES
SCALE NONE

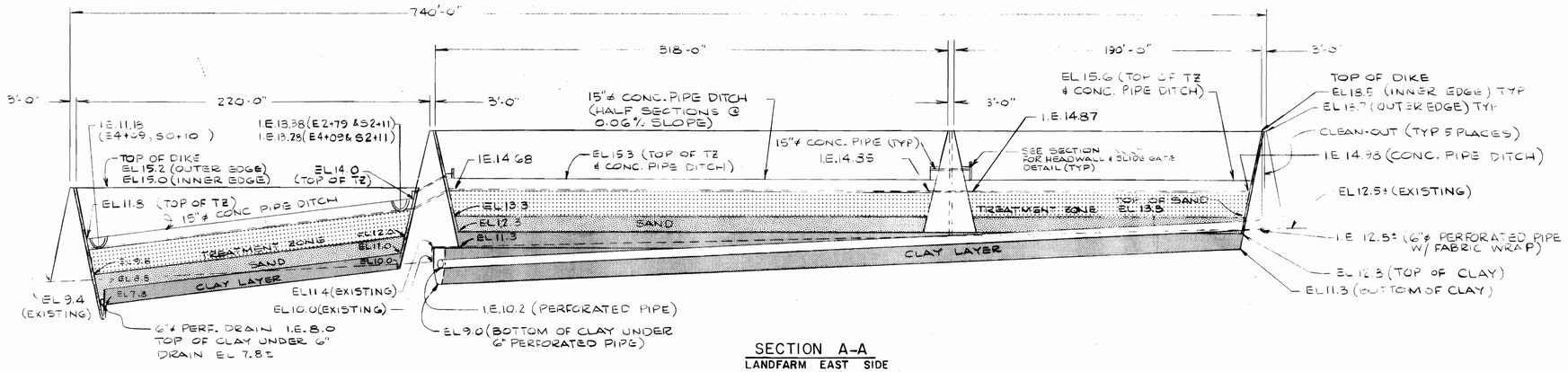
THE AWARE CORPORATION — NASHVILLE, TENNESSEE; HOUSTON, TEXAS

AMERADA HESS CORPORATION
PORT READING REFINERY

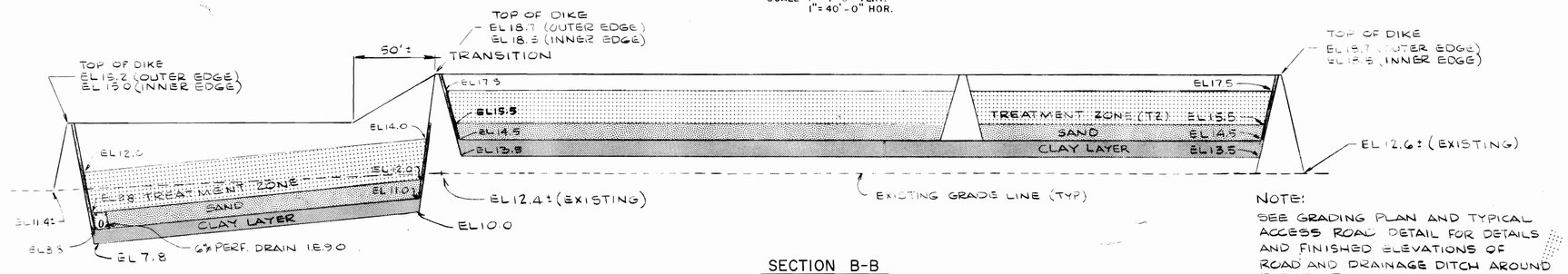
NO. 1 LANDFARM

GRADING PLAN & DETAILS

DESIGNED: E.T.W.	CHECKED:		CLIENT APPR:
DATE: JAN 1985	DATE:		DATE:
DRAWN: L.I.H.	APPROVED:		ISS. FOR CONST:
DATE: JAN 1985	DATE:		DATE:
SCALE: NOTED	DATE PRINTED: JAN 1985	JOB NUMBER: 6217	DWG. NO.: 2 OF 4	REV.

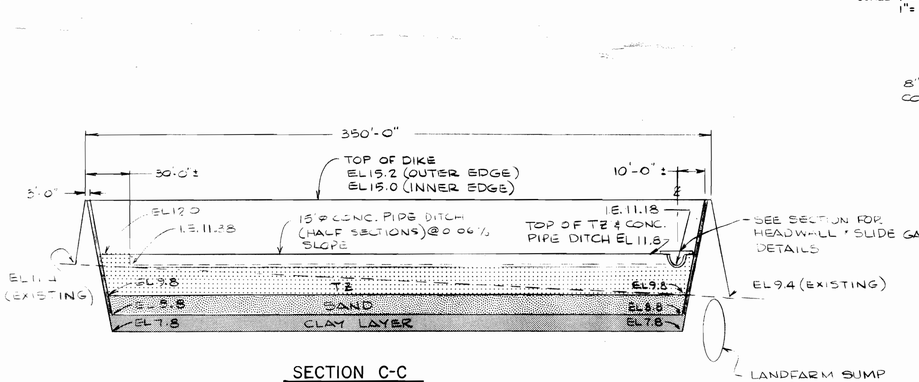


SECTION A-A
LANDFARM EAST SIDE
SCALE 1"= 4'-0" VERT.
1"= 40'-0" HOR.

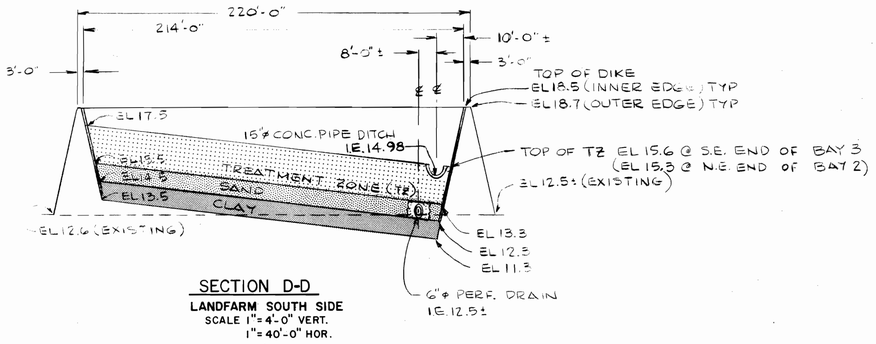


SECTION B-B
LANDFARM WEST SIDE
SCALE 1"= 4'-0" VERT.
1"= 40'-0" HOR.

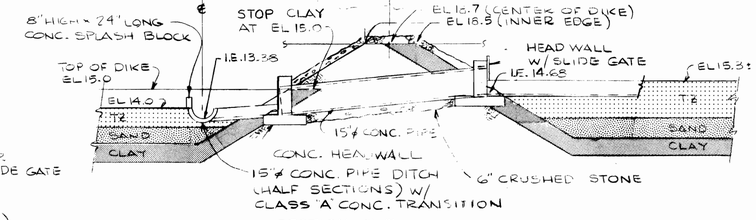
NOTE:
SEE GRADING PLAN AND TYPICAL ACCESS ROAD DETAIL FOR DETAILS AND FINISHED ELEVATIONS OF ROAD AND DRAINAGE DITCH AROUND EXTERIOR DIKE



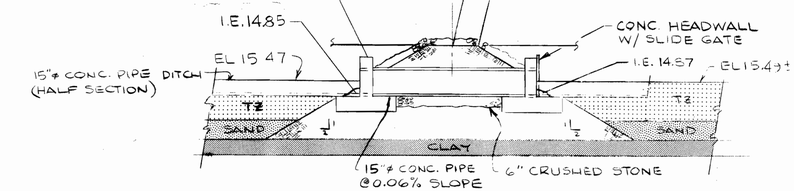
SECTION C-C
LANDFARM NORTH SIDE
SCALE 1"= 4'-0" VERT.
1"= 40'-0" HOR.



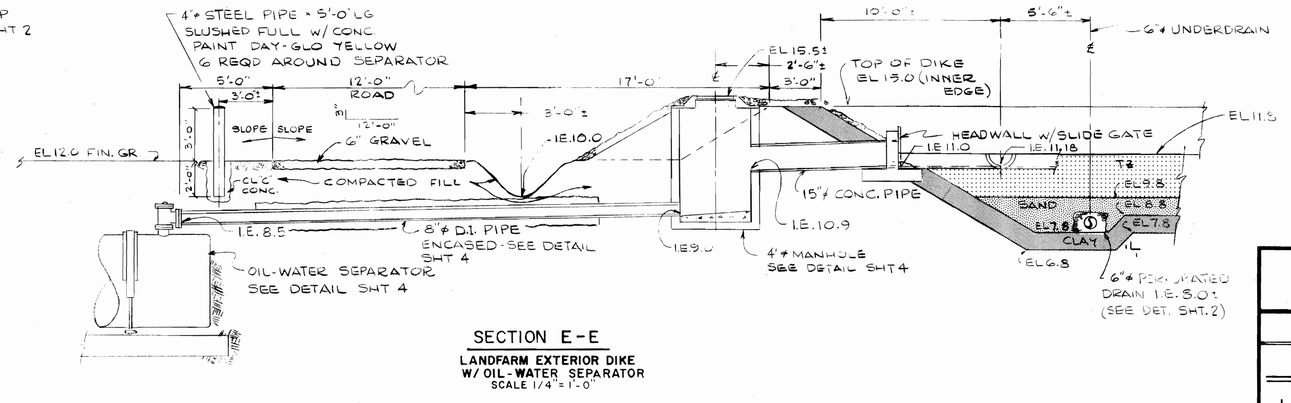
SECTION D-D
LANDFARM SOUTH SIDE
SCALE 1"= 4'-0" VERT.
1"= 40'-0" HOR.



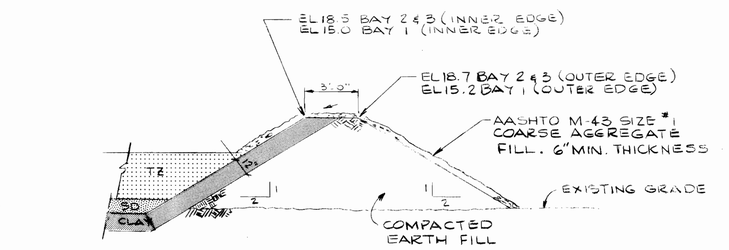
SECTION F-F
LANDFARM INTERIOR DIKE
SCALE 1/4"= 1'-0"



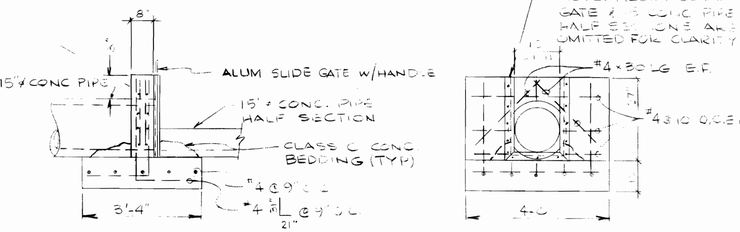
SECTION G-G
LANDFARM INTERIOR DIKE
SCALE 1/4"= 1'-0"



SECTION E-E
LANDFARM EXTERIOR DIKE W/ OIL-WATER SEPARATOR
SCALE 1/4"= 1'-0"



TYPICAL EXTERIOR DIKE
SCALE 1/4"= 1'-0"



TYPICAL HEADWALL & SLIDE GATE DETAIL
SCALE 1/2"= 1'-0"

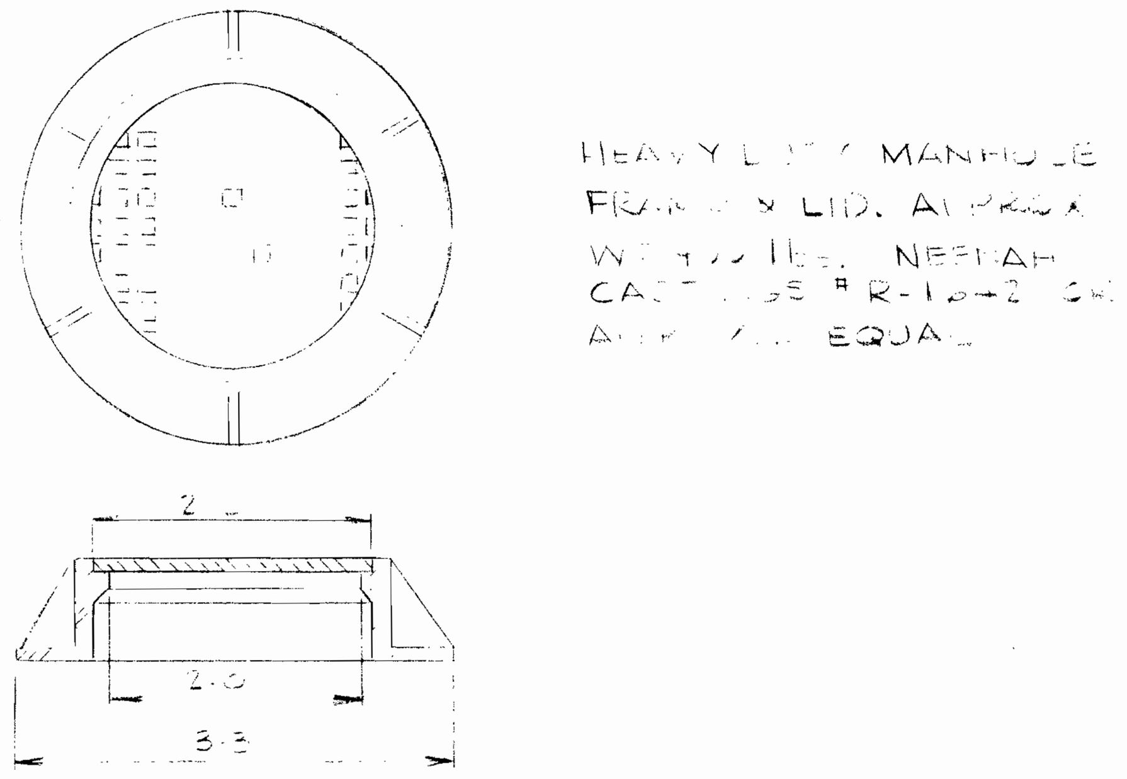
THE AWARE CORPORATION
NASHVILLE, TENNESSEE
HOUSTON, TEXAS

AMERADA HESS CORPORATION
PORT READING REFINERY

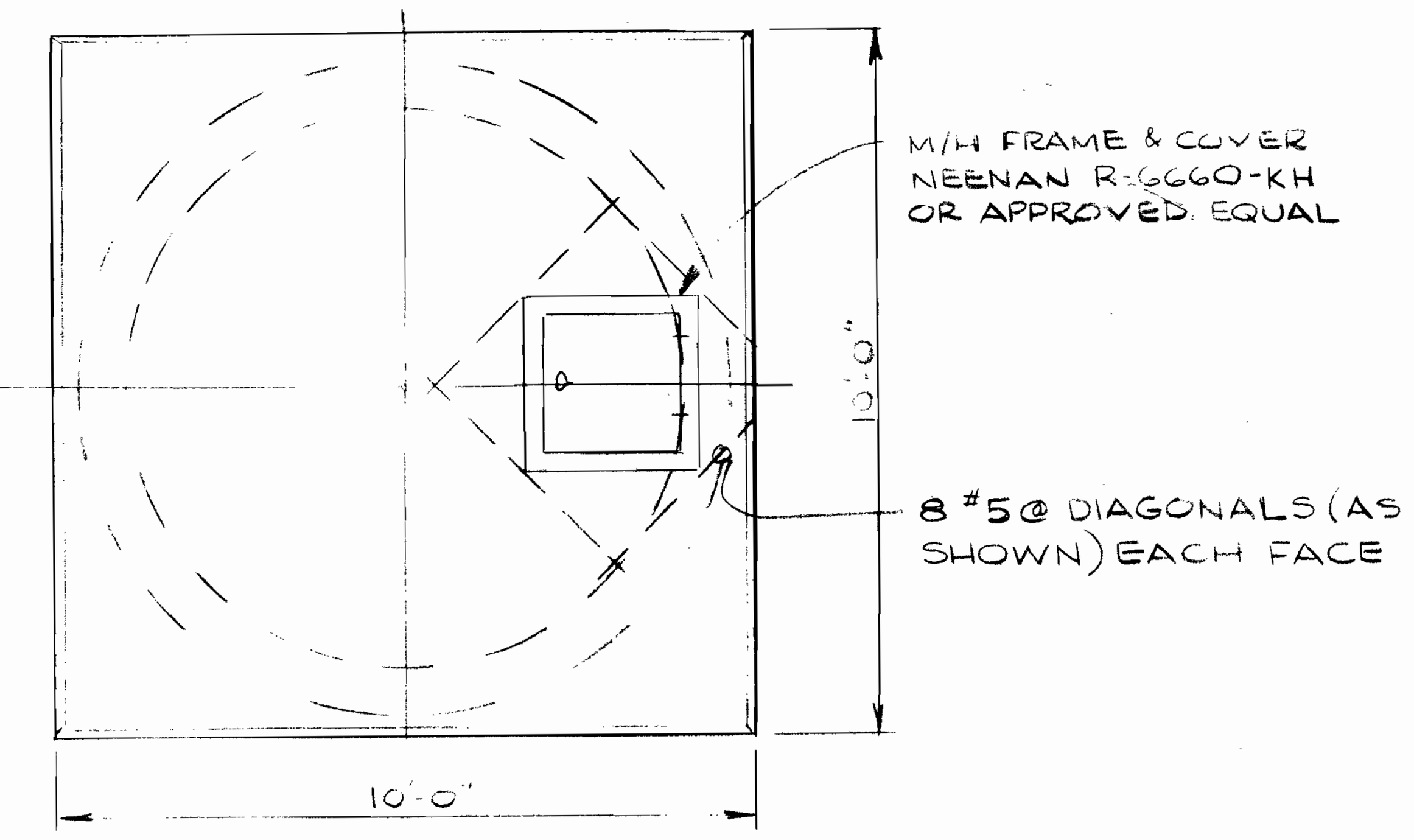
NO 1 LANDFARM

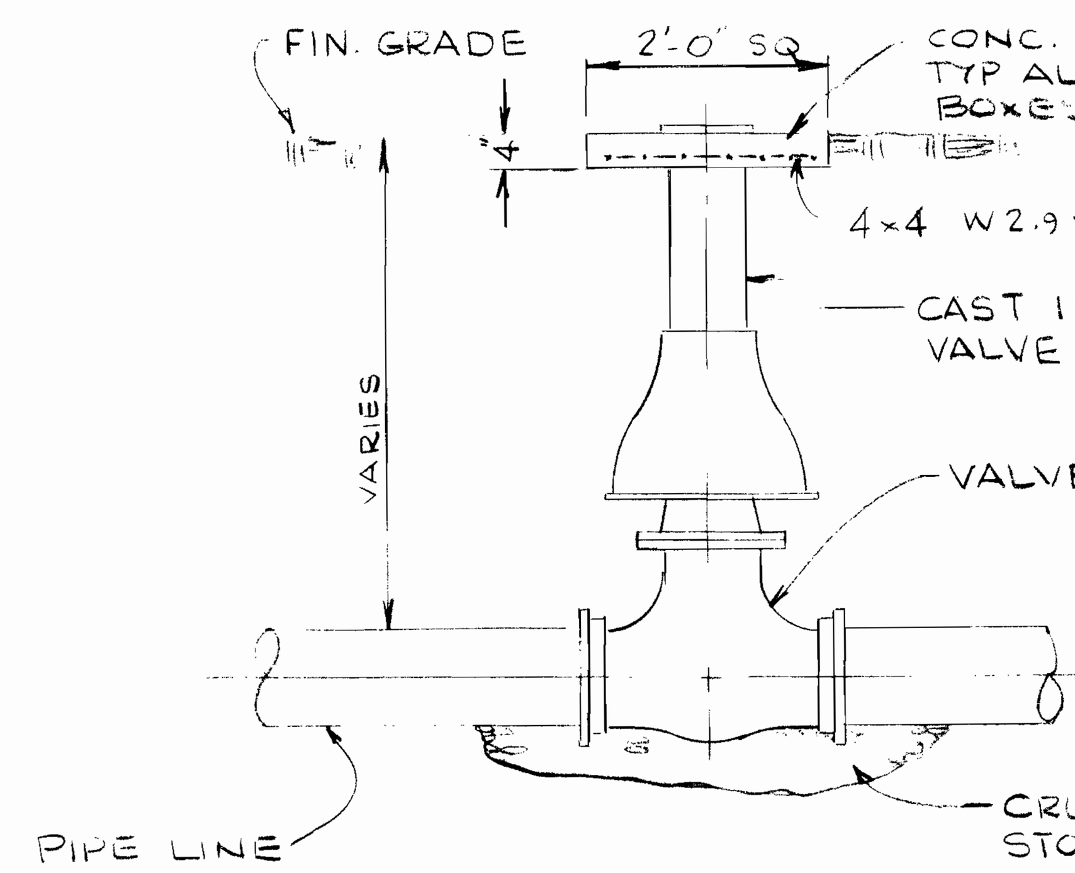
LANDFARM SECTIONS & DETAILS

DESIGNED: E.T.W.	CHECKED:		CLIENT APPR.
DATE: JAN 1985	DATE:		DATE:
DRAWN: L.I.H.	APPROVED:		ISS FOR CONST:
DATE: JAN 1985	DATE:		DATE:
SCALE: NOTED	DATE PRINTED: JAN 1985	JOB NUMBER: 6217	DWG. NO.: 3 OF 4	REV

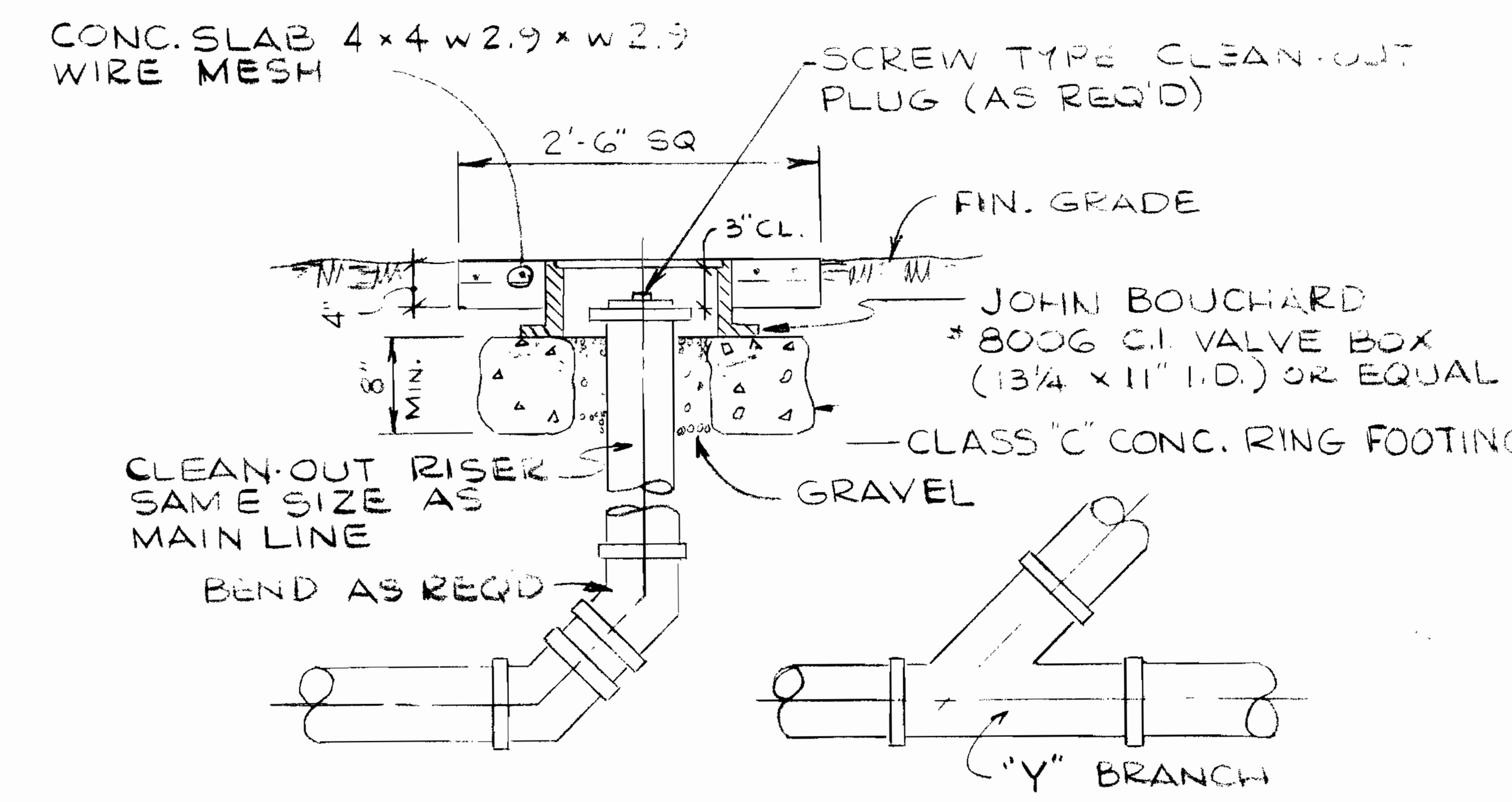


MANHOLE FRAME & COVER
NO SCALE

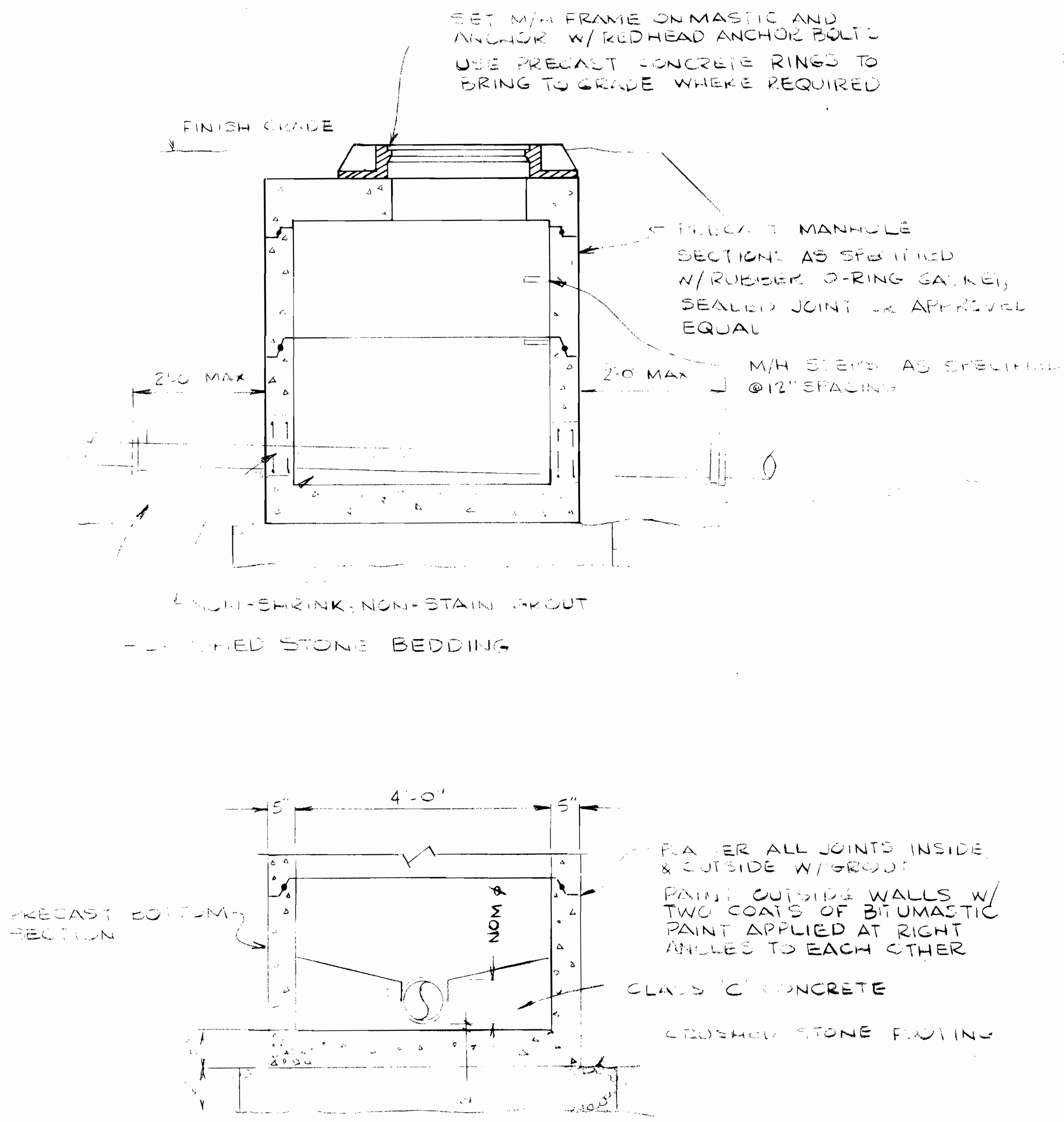




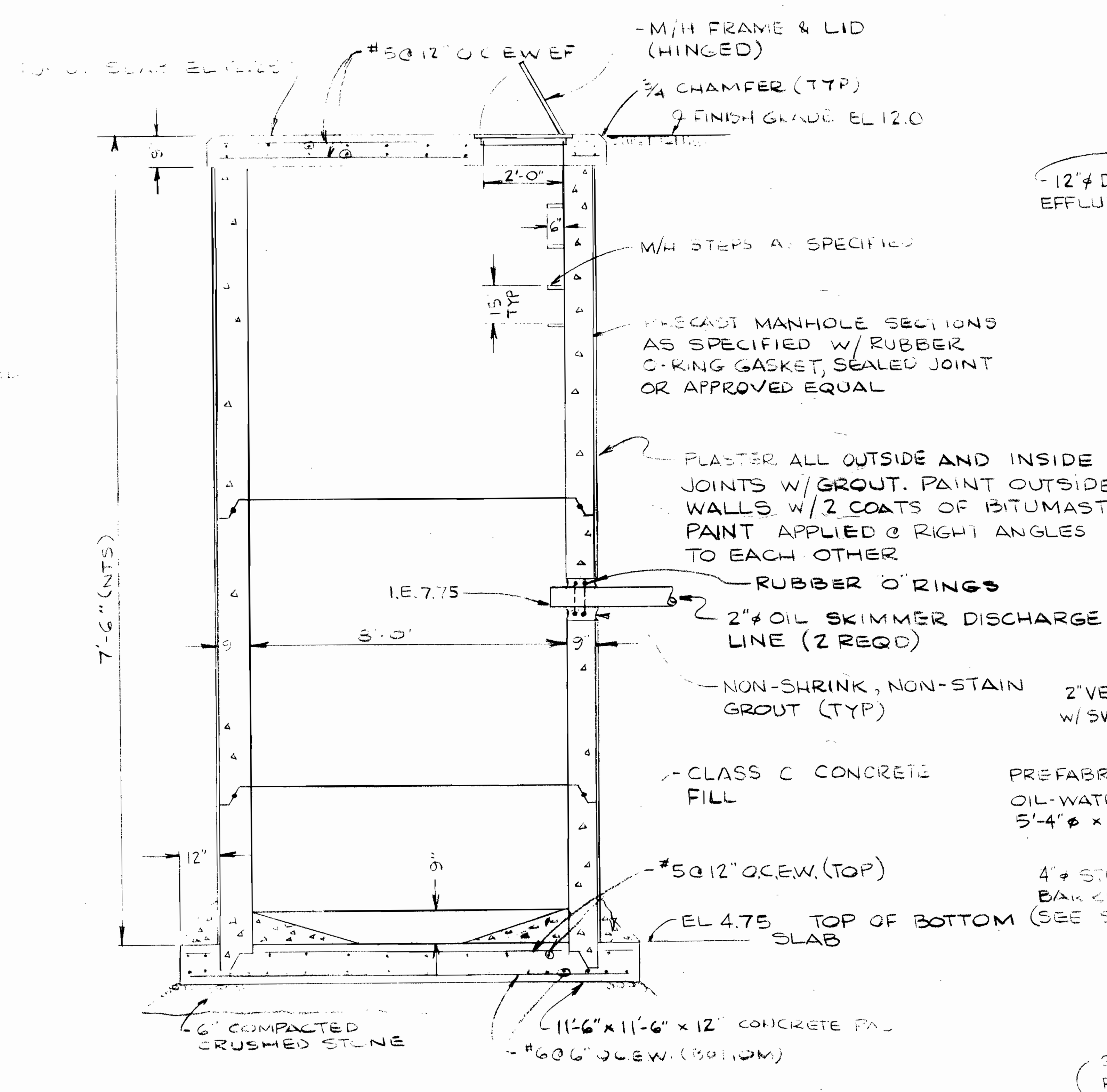
TYPICAL VALVE SETTING
NO SCALE



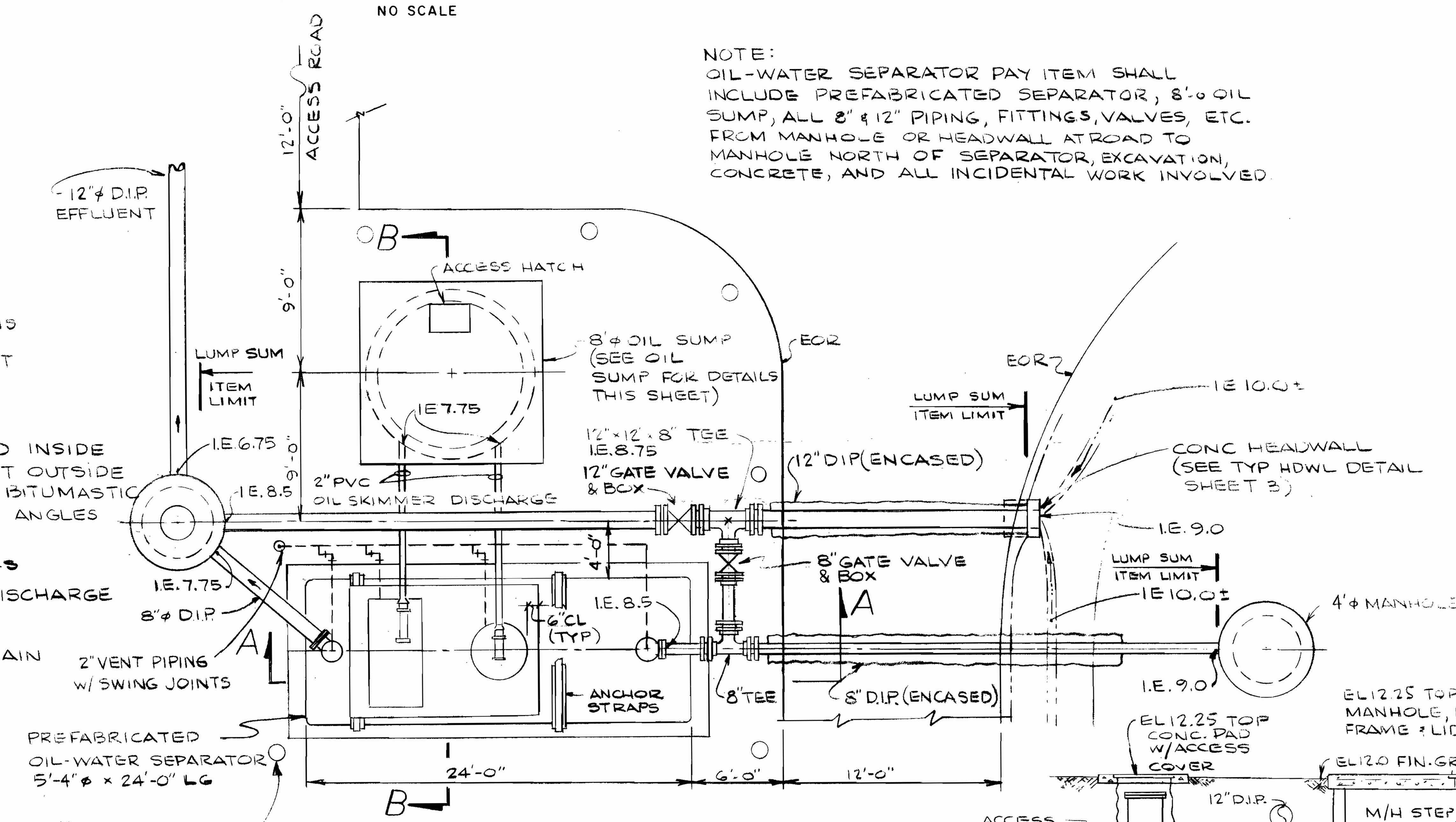
TYPICAL CLEANOUT DETAIL
NO SCALE



STANDARD PRECAST MANHOLE
NO SCALE

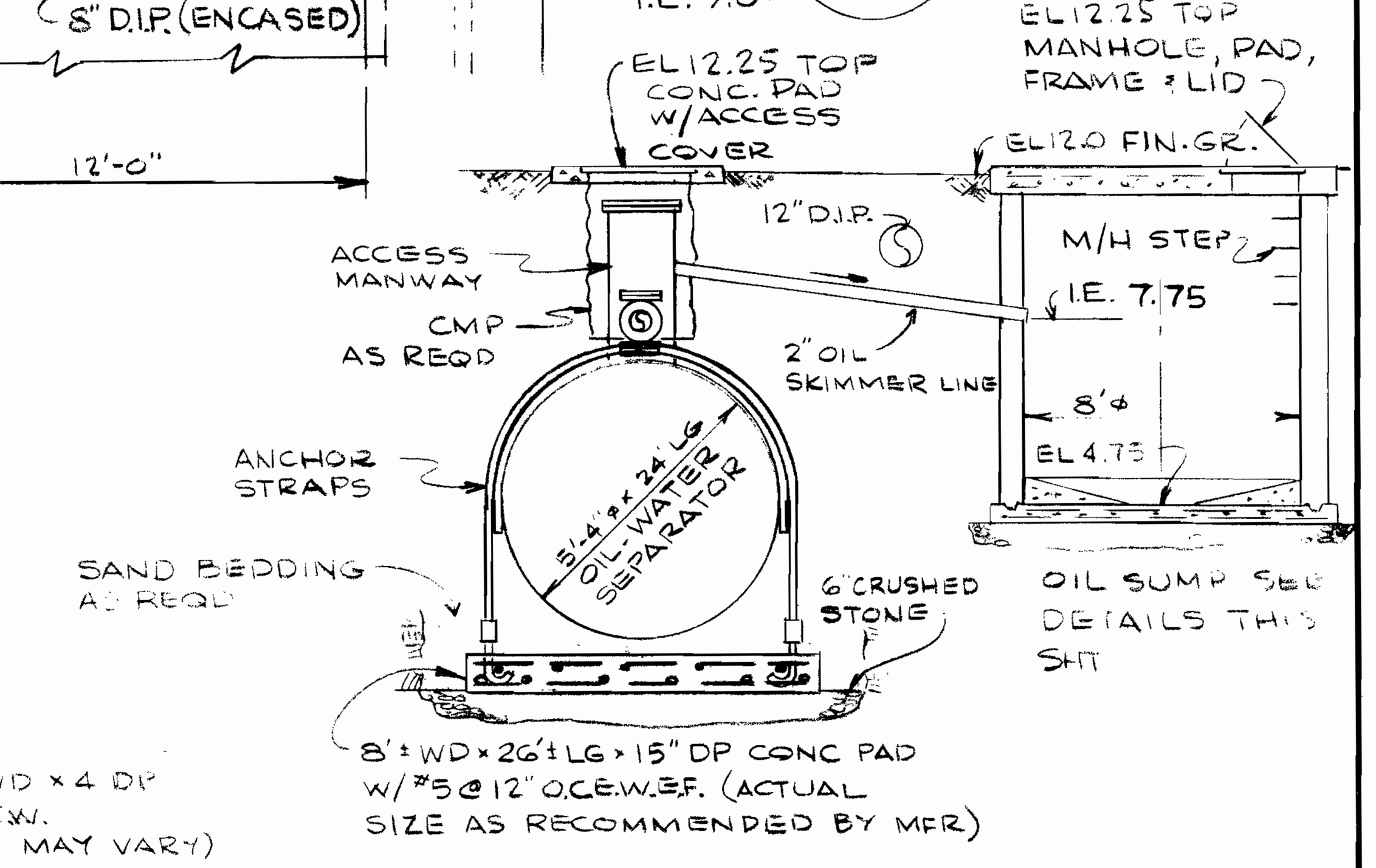


OIL SUMP
NO SCALE

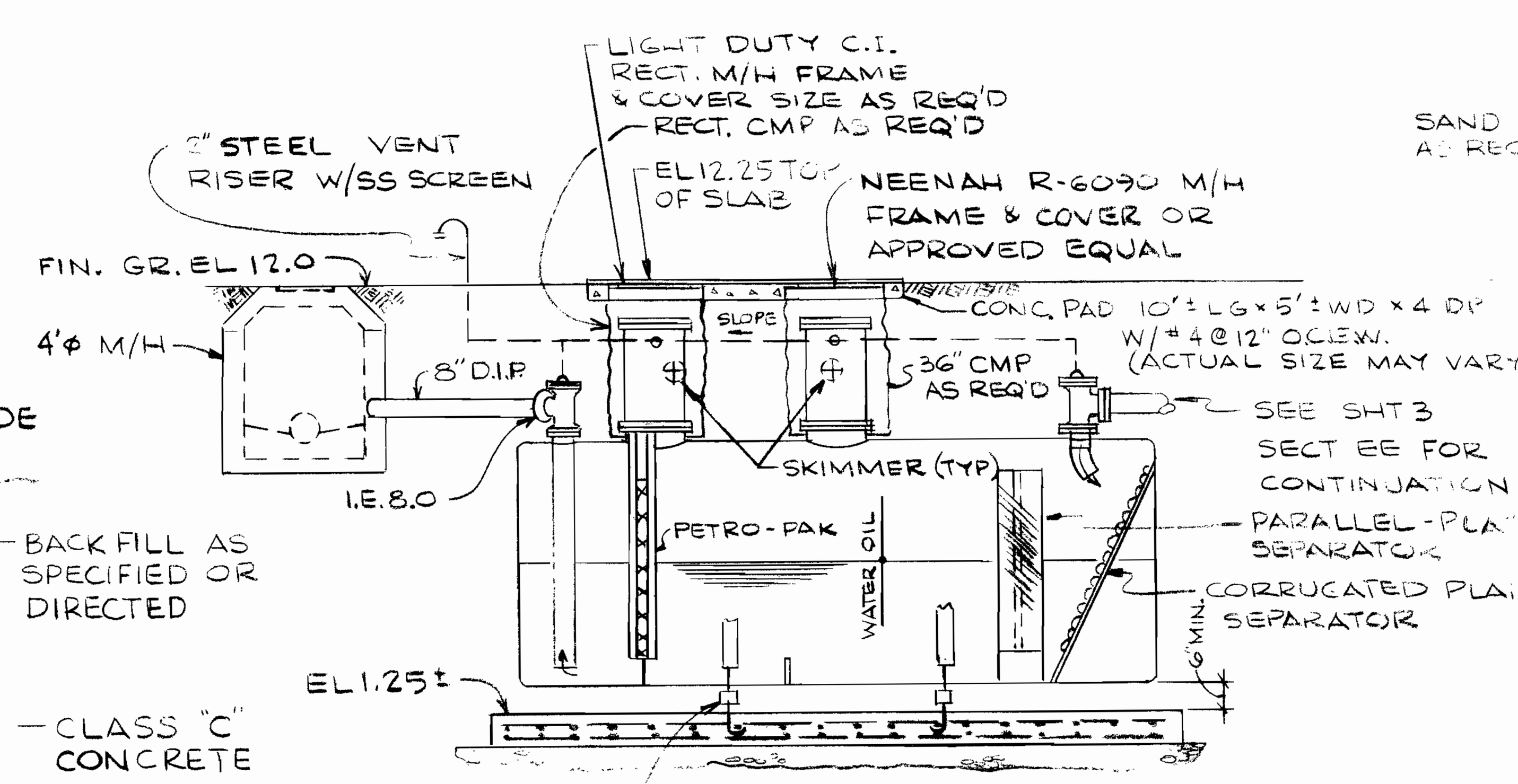


PLAN

NOTE:
OIL-WATER SEPARATOR PAY ITEM SHALL INCLUDE PREFABRICATED SEPARATOR, 8'-0 OIL SUMP, ALL 8" & 12" PIPING, FITTINGS, VALVES, ETC. FROM MANHOLE OR HEADWALL AT ROAD TO MANHOLE NORTH OF SEPARATOR, EXCAVATION, CONCRETE, AND ALL INCIDENTAL WORK INVOLVED



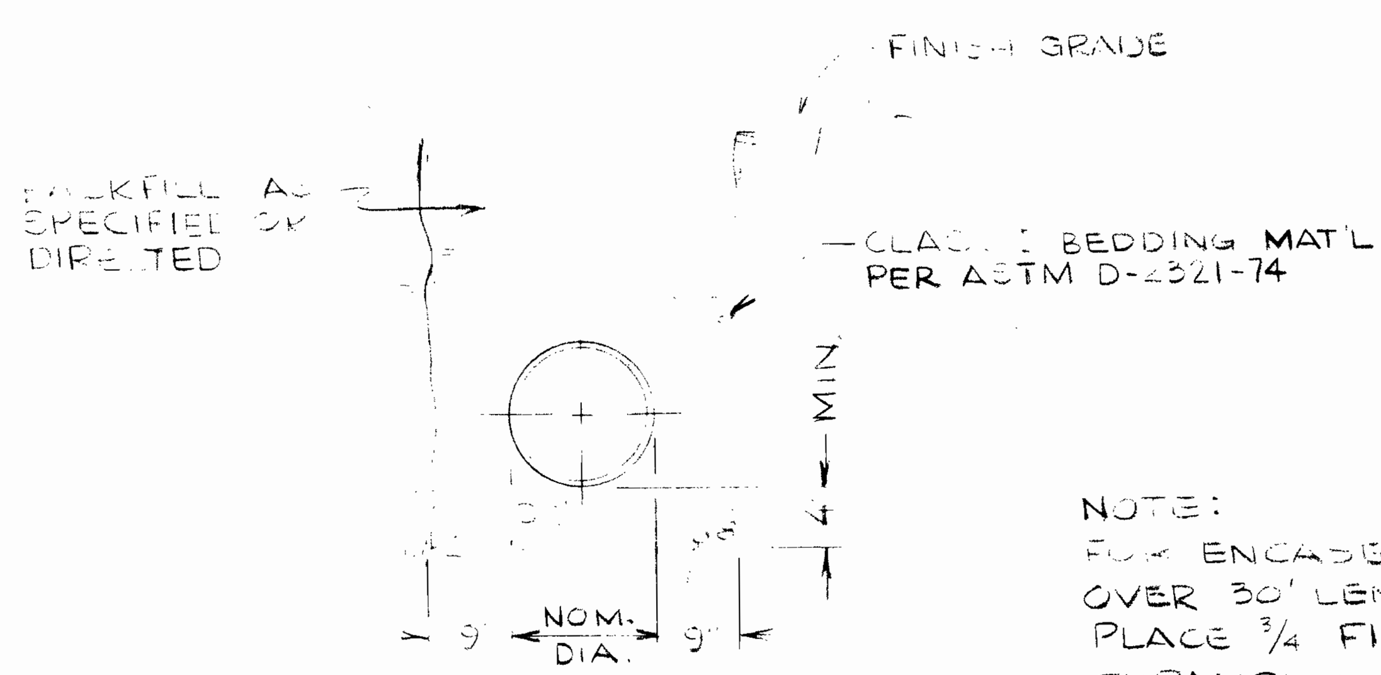
SECTION B-B



SECTION A-A

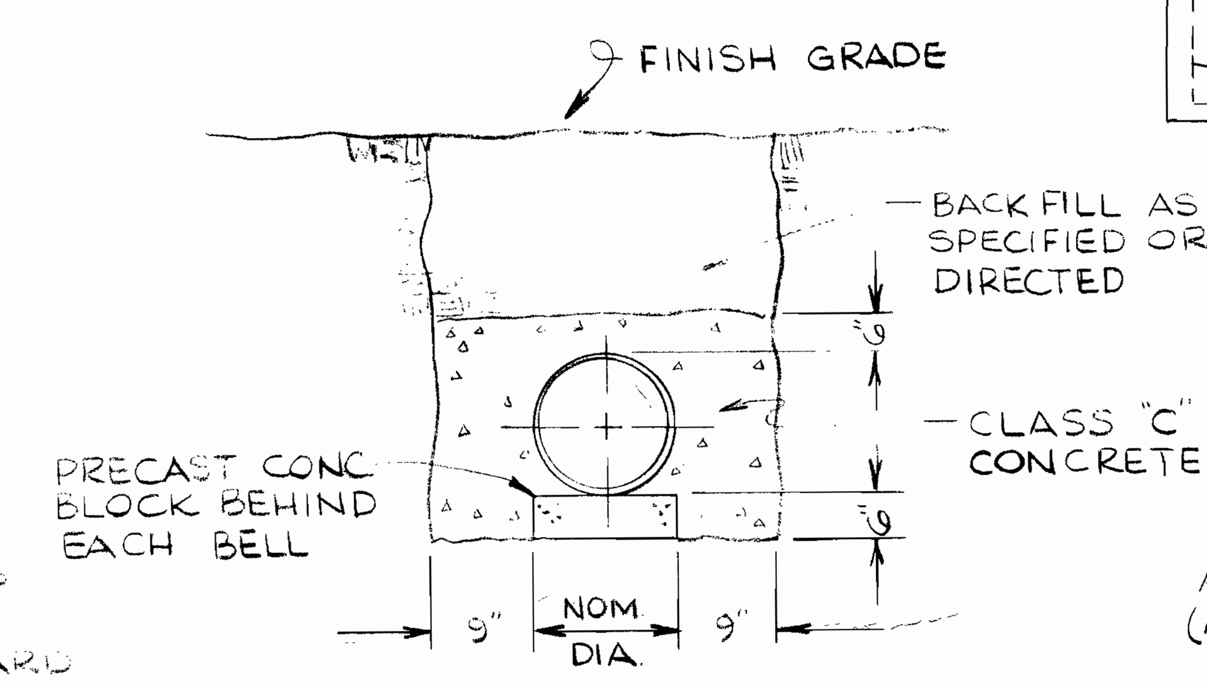
ANCHOR STRAPS - (AS RECOMMENED BY MFR.)

OIL-WATER SEPARATOR
NO SCALE



STANDARD PIPE BEDDING
NO SCALE

NOTE:
FOR ENCASEMENTS OVER 30' LENGTHS PLACE ¾ FIBERBOARD EXPANSION JOINT AT PIPE JOINTS BETWEEN POURS EVERY 30'



STANDARD CONCRETE ENCASEMENT
NO SCALE

THE AWARE CORPORATION
NASHVILLE, TENNESSEE
HOUSTON, TEXAS

AMERADA HESS CORPORATION
PORT READING REFINERY

NO I LANDFARM

MISCELLANEOUS DETAILS

DESIGNED: E.T.W.	CHECKED:	CLIENT APPR:
DATE: JAN 1985	DATE:	DATE:
DRAWN: L.I.H.	APPROVED:	ISS. FOR CONST:
DATE: JAN 1985	DATE:	DATE:

SCALE	DATE PRINTED	JOB NUMBER	DWG. NO.	REV.
NOTED	JAN 1985	6217	4 OF 4	

2022 NJPDES Inspection Report

(Comment 9)

Inspection Summary Report for FORMER HESS PORT READING COMPLEX - Activity Number SCI 220001

Oct 18, 2022 02:27

NOTE: The information contained in this report will be limited to the date each program began using the Department's integrated database, NJEMS. The programs began using the system for this information as follows: Air - 10/1998; Hazardous Waste - 1/2000; Water - 7/2000; TCPA - 12/2001; Land Use 12/2001; DPCC - 1/2002; Solid Waste - 1/2002; Right To Know - 3/2002 and Pesticides - 4/2002; Site Remediation - 3/2003 and Radiation (limited information) - 7/2006. For complete information prior to these dates, please submit an official OPRA request form to the Department. If printing this report, select landscape orientation.

Disclaimer: Only final inspection reports are listed in this report. Inspections for which a report has not been finalized by the Department will not appear in this report. Also, inspections which yield violations but where the inspected entity has not yet been notified of the violation are not listed in this report. For inspections indicating Out of Compliance, this means that violations were observed during the inspection, based on facts and information known to the Department at the time of the inspection. Errors or omissions in the factual basis for any violation may result in a future change in classification as a violation when such information becomes known.

Activity Number: SCI 220001 **Inspection Type:** *Standard Compliance Inspection **Program Interest ID:** 629577

Inspection Start Date: 6/16/22 **End Date:** 6/16/22 **Lead Investigator:** Lockward, Daniel

Program Interest Name: FORMER HESS PORT READING COMPLEX

Address: 750 CLIFF RD Port Reading NJ 07064 **County:** Middlesex - Woodbridge Twp

Block(s) and Lot(s): Block 756.B Lot 2, Block 760.01 Lot 3, Block 760.02 Lot 1, Block 756 Lot 3, Block 756.B Lot 3, Block 756.02 Lot 1, Block 756.B Lot 7, Block 760 Lot 6, Block 760.02 Lot 2, Block 756.B Lot 4.A, Block 760.B Lot 2, Block 760 Lot 1.D, Block 760.A Lot 3, Block 760.B Lot 1, Block 756.01 Lot 2, Block 756.01 Lot 3, Block 756.B Lot 4.B, Block 1095.01 Lot 6, Block 760 Lot 1.B,

Block 760.B Lot 3, Block blue Lot blue, Block 756.B Lot 1, Block 757 Lot 1. . . .

Comments:

For PI# 629577:

NJG0225720 B4B Groundwater Remediation Permit

Issuance Date: 01/14/2019
Effective Date: 02/01/2019
Expiration Date: 12/31/2023

DMRs reviewed for DSN001A for monitoring period 06/01/2021 to 05/31/2022. WET Test conducted during monitoring period 03/01/2022 to 03/31/2022. No issues reported or observed. See checklist for additional items.

For PI# 891518:

NJG0310905 B4B Groundwater Remediation Permit

Issuance Date: 09/15/2020
Effective Date: 10/01/2020
Expiration Date: 12/31/2023

DMRs reviewed for DSN001A for monitoring period 09/01/2021 to 05/31/2022. NODI reported for monitoring period 09/01/2021 to 09/30/2021 and 12/01/2021 to 12/31/2021. No issues reported or observed. See checklist for additional items.

NJ0313106 RF Individual Stormwater Permit

Issuance Date: 7/28/2021
Effective Date: 08/01/2021
Expiration Date: 07/31/2026

No monitoring required under this permit due to monitoring already in place for NJG0310905. No issued reported or observed. See checklist for additional items.

Subject Item: **GDR** **0** **-** **General Discharge Requirements**

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source

Are all MRFs certified by the highest ranking official having day-to-day managerial and operational responsibilities for the discharging facility? . [N.J.A.C. 7:14A- 6.9(a)]	In Compliance				DSW 200001
Are all violations reported to the Department as required in N.J.A.C. 7:14A-6.10?. [N.J.A.C. 7:14A- 6.10]	In Compliance				DST 200001
Are intermittent discharges monitored as required by the permit?. [N.J.A.C. 7:14A- 6.5(a)]	In Compliance				DST 200001
Did the permittee begin electronically submitting identified documents and reports, if required to be submitted by this permit, to the NJDEP by December 21, 2020 via the Department's designated Electronic Submission Service? . [40 CFR 127]	In Compliance				DST 200001
Did the permittee complete monitoring reports in accordance with the current Discharge Monitoring Report Manual and any updates?. [N.J.A.C. 7:14A- 6.8(a)]	In Compliance				DSW 200001
Does the facility employ a licensed operator who holds the appropriate classification of license to operate the treatment works?. [N.J.A.C. 7:10A- 1.1]	In Compliance				DSW 200001
Does the facility have any unpermitted discharge of domestic wastewater, non-contact cooling water, leachate, or process water?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance	None reported, none observed.			DST 200001
Does the permittee have any discharges not authorized by a valid permit?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance	None reported, none observed.			DSW 200001
Has the permittee notified the Department's Examination and Licensing Unit of any changes in licensed operator status?. [N.J.A.C. 7:10A- 1.1]	In Compliance				DSW 200001
If, during or after the preparation of the SPPP, the facility discovered that it generated and discharged to surface waters any domestic wastewater, non-contact cooling water, or process waste water (including leachate and cooling water), did the facility discontinue such discharges or apply for the appropriate NJPDES DSW permit? . [N.J.A.C. 7:14A- 4.2(a)]	In Compliance				DST 200001
Is the permittee storing residuals beyond the capacity of the structural storage and treatment units?. [N.J.A.C. 7:14A-20.8(a)]	In Compliance				DSW 200001
OPERATOR CERTIFICATION.	Sub-Heading				DSW 200001
Standard Reporting Requirements - Electronic Submission of NJPDES Information.	Sub-Heading				DSW 200001
Were MRFs submitted at the frequencies identified in Part III of this permit?. [N.J.A.C. 7:14A- 6.5(b)3]	In Compliance				DSW 200001

Did the permittee begin electronically submitting identified documents and reports, if required to be submitted by this permit, to the NJDEP by December 21, 2020 via the Department's designated Electronic Submission Service? . [40 CFR 127]	In Compliance				DSW 200001
Standard Reporting Requirements – Monitoring Report Forms (MRFs).	Sub-Heading				DSW 200001
Are all violations reported to the Department as required in N.J.A.C. 7:14A-6.10?. [N.J.A.C. 7:14A- 6.10]	In Compliance				DSW 190001
OPERATOR CERTIFICATION.	Sub-Heading				DSW 190001
Does the facility employ a licensed operator who holds the appropriate classification of license to operate the treatment works?. [N.J.A.C. 7:10A- 1.1]	In Compliance				DSW 190001
Has the permittee notified the Department's Examination and Licensing Unit of any changes in licensed operator status?. [N.J.A.C. 7:10A- 1.1]	In Compliance				DSW 190001
Does the permittee have any discharges not authorized by a valid permit?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance	None reported, none observed.			DSW 190001
Is the permittee storing residuals beyond the capacity of the structural storage and treatment units?. [N.J.A.C. 7:14A-20.8(a)]	In Compliance				DSW 190001
Standard Reporting Requirements – Monitoring Report Forms (MRFs).	Sub-Heading				DSW 190001
Were MRFs submitted at the frequencies identified in Part III of this permit?. [N.J.A.C. 7:14A- 6.5(b)3]	In Compliance				DSW 190001
Are all MRFs certified by the highest ranking official having day-to-day managerial and operational responsibilities for the discharging facility? . [N.J.A.C. 7:14A- 6.9(a)]	In Compliance				DSW 190001
Did the permittee complete monitoring reports in accordance with the current Discharge Monitoring Report Manual and any updates?. [N.J.A.C. 7:14A- 6.8(a)]	In Compliance				DSW 190001
Standard Reporting Requirements - Electronic Submission of NJPDES Information.	Sub-Heading				DSW 190001
Did the permittee begin electronically submitting identified documents and reports, if required to be submitted by this permit, to the NJDEP by December 21, 2020 via the Department's designated Electronic Submission Service? . [40 CFR 127]	In Compliance				DSW 190001

Subject Item: **B4B** **0** **-** **Groundwater Petroleum Product Cleanup (GP)**

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source
MONITORING REQUIREMENTS.	Heading				DSW 190001
MONITORING REQUIREMENTS.	Heading				DSW 200001
Were all analyses performed by a New Jersey Certified Laboratory? Indicate lab name(s). [N.J.A.C. 7:14A- 6.5(a)2]	In Compliance	Accutest - #12129, Earth Systems - #13040, Alpha Analytical - #MA935			DSW 200001
Were all analyses performed by a New Jersey Certified Laboratory? Indicate lab name(s). [N.J.A.C. 7:14A- 6.5(a)2]	In Compliance	Accutest - #12129, Earth Systems - #13040, Alpha Analytical - #MA935, American Aquatic - #PA682			DSW 190001
Were analyses of wastewater performed in accordance with the appropriate analytical test procedures? . [N.J.A.C. 7:14A- 6.5(a) 2]	In Compliance				DSW 190001
Were analyses of wastewater performed in accordance with the appropriate analytical test procedures? . [N.J.A.C. 7:14A- 6.5(a) 2]	In Compliance				DSW 200001
Do all analytical methods ensure compliance with the Quantitation Levels (QLs) listed in PART III of the Permit?. [N.J.A.C. 7:14A- 6.5(b)3]	In Compliance				DSW 190001
Do all analytical methods ensure compliance with the Quantitation Levels (QLs) listed in PART III of the Permit?. [N.J.A.C. 7:14A- 6.5(b)3]	In Compliance				DSW 200001
Was sampling conducted in accordance with the Field Sampling Procedures Manual or other Department approved method?. [N.J.A.C. 7:14A- 6.5(b)4]	Compliance Not Determined	Sampling not observed during inspection.			DSW 190001

Was sampling conducted in accordance with the Field Sampling Procedures Manual or other Department approved method?. [N.J.A.C. 7:14A- 6.5(b)4]	Compliance Not Determined	Sampling not observed during inspection.			DSW 200001
Was all monitoring conducted in accordance with Part III of the Permit?. [N.J.A.C. 7:14A- 6.5(b)]	In Compliance				DSW 190001
Was all monitoring conducted in accordance with Part III of the Permit?. [N.J.A.C. 7:14A- 6.5(b)]	In Compliance				DSW 200001
If the permittee took additional samples above the minimum specified in the permit, were all of the results reported on the Monitoring Report Forms?. [N.J.A.C. 7:14A- 6.8(e)]	In Compliance				DSW 190001
If the permittee took additional samples above the minimum specified in the permit, were all of the results reported on the Monitoring Report Forms?. [N.J.A.C. 7:14A- 6.8(e)]	In Compliance				DSW 200001
Was flow measured using a meter unless specified otherwise? . [N.J.A.C. 7:14A- 6.5(a)1]	In Compliance				DSW 190001
Was flow measured using a meter unless specified otherwise? . [N.J.A.C. 7:14A- 6.5(a)1]	In Compliance				DSW 200001
RECORDKEEPING.	Heading				DSW 190001
RECORDKEEPING.	Heading				DSW 200001
Does the permittee appropriately retain monitoring records? . [N.J.A.C. 7:14A- 6.6(a)]	In Compliance				DSW 190001
Does the permittee appropriately retain monitoring records? . [N.J.A.C. 7:14A- 6.6(a)]	In Compliance				DSW 200001
REPORTING.	Heading				DSW 190001
REPORTING.	Heading				DSW 200001
DISCHARGE REQUIREMENTS.	Sub-Heading				DSW 190001
DISCHARGE REQUIREMENTS.	Sub-Heading				DSW 200001
Did the permittee discharge only at the authorized location(s)?. [N.J.A.C. 7:14A-13.16(a)1]	In Compliance				DSW 190001
Did the permittee discharge only at the authorized location(s)?. [N.J.A.C. 7:14A-13.16(a)1]	In Compliance				DSW 200001
Was there a discharge of or evidence of foam in the receiving stream?. [N.J.A.C. 7:14A-12.6(a)]	In Compliance	None reported, none observed.			DSW 190001
Was there a discharge of or evidence of foam in the receiving stream?. [N.J.A.C. 7:14A-12.6(a)]	In Compliance	None reported, none observed.			DSW 200001
Was there a discharge of objectionable color or odor in the receiving stream? . [N.J.A.C. 7:14A-12.6(a)3]	In Compliance	None reported, none observed.			DSW 190001

Was there a discharge of objectionable color or odor in the receiving stream? . [N.J.A.C. 7:14A-12.6(a)3]	In Compliance	None reported, none observed.			DSW 200001
Did the discharge exhibit a visible sheen? . [N.J.A.C. 7:14A-12.8(c)]	In Compliance	None reported, none observed.			DSW 190001
Did the discharge exhibit a visible sheen? . [N.J.A.C. 7:14A-12.8(c)]	In Compliance	None reported, none observed.			DSW 200001
OPERATION, MAINTENANCE, AND EMERGENCY CONDITIONS.	Sub-Heading				DSW 190001
OPERATION, MAINTENANCE, AND EMERGENCY CONDITIONS.	Sub-Heading				DSW 200001
Does the permittee operate and maintain the treatment works as specified in the O&M Manual?. [N.J.A.C. 7:14A- 6.12(a)]	In Compliance				DSW 190001
Does the permittee operate and maintain the treatment works as specified in the O&M Manual?. [N.J.A.C. 7:14A- 6.12(a)]	In Compliance				DSW 200001
If the permittee permanently discontinues its discharge to surface waters for 30 days or more, was the appropriate Regional Bureau of Water and Compliance Enforcement notified?. [N.J.A.C. 7:14A-16.6(a)4]	In Compliance				DSW 190001
If the permittee permanently discontinues its discharge to surface waters for 30 days or more, was the appropriate Regional Bureau of Water and Compliance Enforcement notified?. [N.J.A.C. 7:14A-16.6(a)4]	In Compliance				DSW 200001
Did the permittee obtain permission from the Department in writing prior to use of any chemical or biofouling agents used to enhance treatment effectiveness and system performance? . [N.J.A.C. 7:14A-16.4(b)1]	In Compliance				DSW 190001
Did the permittee obtain permission from the Department in writing prior to use of any chemical or biofouling agents used to enhance treatment effectiveness and system performance? . [N.J.A.C. 7:14A-16.4(b)1]	In Compliance				DSW 200001
Did the permittee discharge backwash from any treatment unit(s) for maintenance purposes or any other reasons through the authorized outfall(s)?. [N.J.A.C. 7:14A- 6.12(a)]	In Compliance				DSW 190001
Did the permittee discharge backwash from any treatment unit(s) for maintenance purposes or any other reasons through the authorized outfall(s)?. [N.J.A.C. 7:14A- 6.12(a)]	In Compliance				DSW 200001

Were samples taken at the discharge outfall(s) specified in Part III of this permit authorization at the nearest accessible point after final treatment but prior to actual discharge?. [N.J.A.C. 7:14A- 6.5(a)1]	In Compliance	WET Test composite sampler separate from main sampling point, but both are before the actual discharge.			DSW 190001
Were samples taken at the discharge outfall(s) specified in Part III of this permit authorization at the nearest accessible point after final treatment but prior to actual discharge?. [N.J.A.C. 7:14A- 6.5(a)1]	In Compliance	WET Test composite sampler separate from main sampling point, but both are before the actual discharge.			DSW 200001

Subject Item: **RF** **0** **-** **Individual Stormwater (IP)**

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source
Stormwater Pollution Prevention Plan (SPPP).	Heading				DST 200001
SPPP Minimum Requirements.	Sub-Heading				DST 200001
Did the SPPP identify the Best Management Practices (BMPs) that are in place to eliminate, reduce, or minimize exposure of industrial activity and source materials to stormwater discharging to surface or ground water?. [N.J.A.C. 7:14A- 6.2(b)1]	In Compliance				DST 200001
Does the SPPP address exposure at outside vehicle/equipment fueling, maintenance and washing areas, and fuel storage?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001
Does the SPPP address exposure at outside areas used for waste management/handling or storage of equipment (e.g., dumpsters, scrap metals, vehicle parts, drums, and garbage)?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001

Has the facility demonstrated that upon implementation of the SPPP, it has minimized exposure, or the effects of exposure, during and after storm events, of source materials located at the facility to stormwater discharged to surface water?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001
Does the permittee have a Drainage Control Plan (DCP) as a section in their SPPP?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001
Did the permittee identify and implement, as part of their SPPP, BMPs to stabilize surface soils and reduce sediment erosion and transport?. [N.J.S.A. 4:24-39]	In Compliance				DST 200001
Drainage Control Plan.	Sub-Heading				DST 200001
Did the facility develop, implement and/or maintain a DCP?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001
Is the DCP certified by a NJ licensed PE?. [N.J.A.C. 7:14A- 6.2 (a)1]	In Compliance				DST 200001
Was the SPPP prepared in accordance with the permit?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001
Was the SPPP implemented in accordance with the permit?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance				DST 200001
Were the specified BMPs implemented within 30 days of EDP?. [N.J.A.C. 7:14A- 6.2(b)1]	In Compliance				DST 200001
Is the facility conducting inspections at least quarterly?. [N.J.A.C. 7:14A- 6.2(a)1]	In Compliance	Reviewed weekly inspection logs from 09/2021 to 05/2022.			DST 200001
SPPP Preparation Certification and SPPP Implementation Certification Submittal Requirements.	Sub-Heading				DST 200001
Has the permittee prepared and implemented the SPPP, and submitted the certifications as required by the permit?. [N.J.A.C. 7:14A-24.9(a)]	In Compliance	SPPP prepared by Key Environmental in 09/2020. Annual training for 2021 conducted 09/15/2021. Annual certification received 09/23/2021 for 2021.			DST 200001
Did the permittee submit a copy of the SPPP to Enforcement and BNPC?. [N.J.A.C. 7:14A-24.9(a)]	In Compliance				DST 200001

Annual Inspections, Reports, and Recertifications.	Sub-Heading				DST 200001
Did the permittee conduct the annual inspection?. [N.J.A.C. 7:14A-24.9(a)2i]	In Compliance				DST 200001
Did the permittee prepare an annual report?. [N.J.A.C. 7:14A-24.9(a)2ii]	In Compliance				DST 200001
Did the permittee retain the annual report as required by the permit?. [N.J.A.C. 7:14A- 6.6(a)]	In Compliance				DST 200001